

FILED

FEB 06 2013

Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SAFETY RESEARCH &
STRATEGIES, INC.,

Plaintiff,

v.

U.S. DEPARTMENT OF
TRANSPORTATION,

Defendant


Civil Action No. 12-cv-00551 (ESH)

STIPULATION OF SETTLEMENT AND DISMISSAL

Plaintiff Safety Research & Strategies, Inc. and Defendant United States Department of Transportation hereby settle and compromise the above entitled lawsuit brought under the Freedom of Information Act, 5 U.S.C. § 552, as amended ("FOIA"), on the following terms:



1. Plaintiff agrees to dismiss this suit with prejudice.
2. Defendant shall pay \$14,281.00 in attorneys' fees and costs to Plaintiff. Payment of this money will be made by check or electronic funds transfer promptly after notification of the Court's entry of this Stipulation and after receipt of necessary information from counsel for Plaintiff in order to effectuate the payment.
3. This Stipulation of Settlement constitutes the full and complete satisfaction of any and all claims arising from (a) the allegations set forth in the complaint filed in this lawsuit and (b) any litigation or administrative proceeding that Plaintiff has brought, could bring, or could have brought regarding Plaintiff's FOIA request in this case.
4. This Stipulation of Settlement does not constitute an admission of liability or fault on the part of Defendant, the United States, its agents, servants, or employees, and is entered into by both parties for the sole purpose of compromising disputed claims and avoiding the expenses and risks of further litigation.

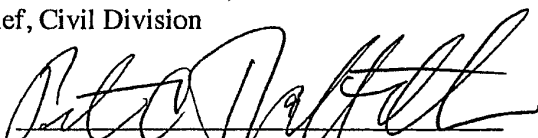
5. This Stipulation of Settlement is binding upon and inures to the benefit of the parties hereto and their respective successors and assigns.
6. The Court retains jurisdiction over enforcement of any other provisions of this Stipulation of Settlement.
7. Execution and filing of this Stipulation of Settlement by counsel for Plaintiff and by counsel for Defendant constitutes a dismissal of this lawsuit, with prejudice, effective upon entry by the Court, pursuant to Rule 41(a)(1)(ii). Any and all remaining issues are waived.

By: 
DAVID L. SOBEL, D.C. Bar #360418
1818 N Street, N.W.
Suite 410
Washington, DC 20036
(202) 246-6180

Counsel for Plaintiff

Executed on January 24, 2013.

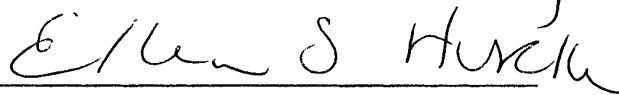

RONALD C. MACHEN, D.C. Bar #447889
United States Attorney
for the District of Columbia

DANIEL VAN HORN, D.C. Bar #924092
Chief, Civil Division

By: 
PETER C. PFAFFENROTH, D.C. Bar #496637
Assistant United States Attorney
555 Fourth St., N.W.
Washington, D.C. 20530
Phone: (202) 514-7188
Fax: (202) 514-8780
Email: peter.pfaffenroth@usdoj.gov

Counsel for Defendant

Executed on January 24, 2013.

It is SO ORDERED on this 6 day of February, 2013.


Hon. Ellen S. Huvelle
UNITED STATES DISTRICT JUDGE